

- Frequency separation is *more conducive to outside investment* in the wireless cable industry than secondary status for response station transmitters, since it virtually eliminates the risk that subscriber equipment will be required to cease operating due to interference.

Q. What is wrong with Petitioners' proposal to cure any interference that may occur?

- A.** Any proposal to cure interference *after* it occurs is unworkable in practice. An ITFS licensee that experiences interference would be required to notify one or more licensees of upstream response station hubs in the area. These licensees would, in turn, have to identify which one or more of potentially hundreds of transmitters were causing the problem. However, until the problem transmitters can be identified and the problem rectified, the ITFS licensee would have to live with the interference. The interference resolution process could drag on indefinitely. This would make an ITFS licensee's right to exclusive use of the spectrum a farce, and would stand the principle of interference-free operation on its head.

Catholic Television Network Frequency Separation Examples

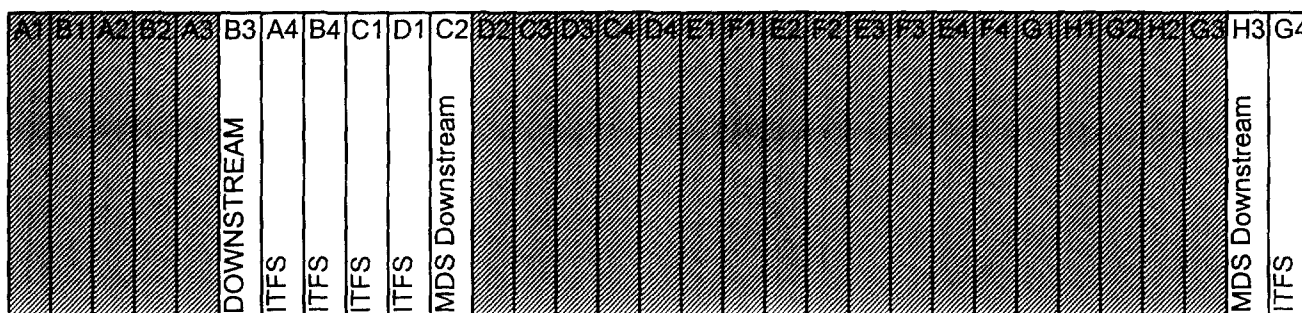


Figure 1. Licensee of E, F, and H Groups with market-wide excess capacity leases.
Each ITFS licensee reserves one of its licensed channels for downstream transmissions.
Maximum upstream capacity = 138 MHz in two blocks.

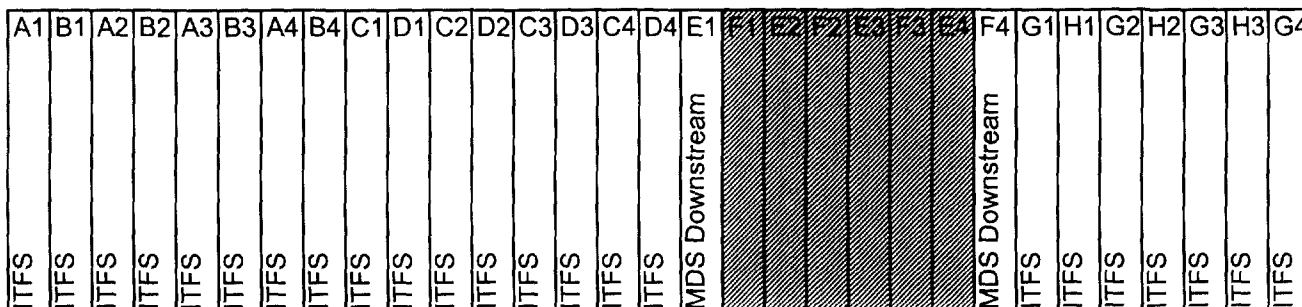


Figure 2. Licensee of E and F Groups with no excess capacity lease.
Maximum upstream capacity = 36 MHz in one block

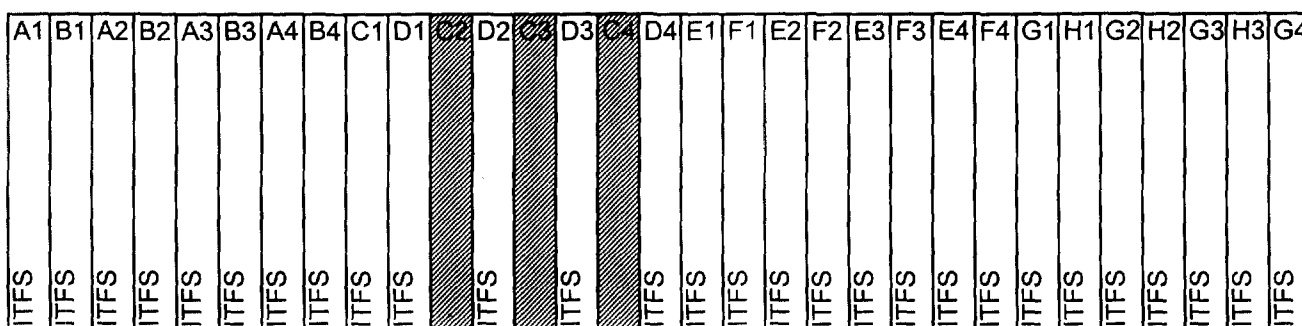



Figure 3. Licensee of C Group, with D Group consent.
Maximum upstream capacity = 18 MHz in three blocks.

Symbol	Description
ITFS	Channel used to transmit ITFS programming to receive sites
MDS Downstream	Channel reserved for MDS communications to subscribers or hubs ("guard band")
	Channel may be used for upstream response station communications from subscribers